

### **Remarks/Arguments**

This amendment is in response to the Office action of October 23, 2006. The current status of the claims is summarized below. Claims 1-20 remain pending upon entry of the present amendment.

#### **Rejections under 35 U.S.C. section 103:**

Claims 1-20 are rejected under U.S.C. 103(a), as being unpatentable over U.S. Patent No. 5,896,131 to Alexander further in view of the U.S. Patent No. 5,745,103 to Smith. The Applicants respectfully traverse these rejections.

The Office has cited sections of Alexander (*column 4, lines 15-20*) to support the claim that suggests the system uses reserved DRAM colors to draw a boundary around the dialog box. The Office, in the cited sections of Alexander (*column 4 lines 15-20*), has equated a ***rectangular area (202)*** to a ***dialog box area (204)*** to suggest that the system uses these reserved DRAM colors to draw the rectangular area which is a dialog box. (See Office action page 13, last two lines of the last paragraph, under Response to Argument). The Applicants would like to kindly point out that the rectangular area of Alexander is equal to the displayed background of the claimed invention which is distinctly different from the dialog box area.

Next, Alexander is silent about **drawing a boundary surrounding** the dialog box to maintain visual differentiation between the dialog box and the displayed background. In fact, the color within the dialog box may be the same color as the reserved color in the rectangular area or may be slightly different making it impossible to **visually differentiate** without a boundary surrounding the dialog box: "perimeter area 200 is defined within DRAM 106 by a windows operating system. **Rectangular area 202** is **drawn** in DRAM 106 in the **programmed dark gray color** (and also .... Controller 112). An interactive **dialog box 204** is **drawn by the windows operating system**, in DRAM 106 within rectangle 202." (See column 4, lines 14-20).

As can be seen from the above cited section, the specification is not clear on what color is being used by the windows operating system for the background in the interactive dialog box or whether any boundary is drawn surrounding the dialog box to visually differentiate the dialog box from the background of the rectangular area. (See column 4, lines 17-21). The color of the dialog box background may be defined with the same programmed color as the rectangular area 202 making it hard to distinguish the dialog box from the rectangular area.

Finally, the Office has cited section of Alexander (column 4, lines 45-50) indicating that the light gray becomes a reserved color when it is selected as a color to bypass another reserved color, dark gray, and is stored in DRAM as a controlling parameter. Nowhere in the cited sections is there a mention that the light gray is a reserved color. Even if light gray color is considered a reserved color (as it bypasses another reserved color), the dark gray and the light gray colors are stored in DRAM as data path switch control parameters for the multiplexer and are not used for display (in order to differentiate the dialog box from the surrounding rectangular area). (See column 4, lines 8-13). The section relied by the Examiner in column 4, lines 4-7 teaches using a programmed dark gray (reserved) color to define a rectangular pixel area *within DRAM* 106. This programmed dark gray color is used as a data path switch control for multiplexer and is not used for displaying. (See column 4, lines 8-10). The section defined in column 4, lines 37-40 teaches a translucent dialog box wherein the frame 302 (background of the dialog box 300 – See Figure 3A), information areas 304 and controls 306 within the dialog box are opaque and are written in a color other than the programmed color. Section defined in column 4, lines 45-48 of Alexander teaches writing remaining pixels within the dialog box (that are not written in programmed color) in a color other than the programmed color. None of the cited sections (Column 4, lines 4-7, lines 37-40, and lines 45-48) suggest or teach drawing a boundary surrounding the dialog box using a permanently reserved color. The Office has failed to point out this feature

(surrounding the dialog box using only a reserved color) to differentiate the dialog box from the displayed background in the cited art.

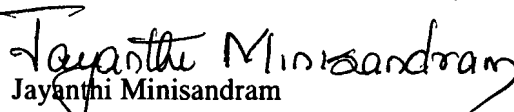
In contrast, the claimed invention, in order to provide visual differentiation between the dialog box and the displayed background, uses the reserved color to draw a boundary surrounding the dialog box, the reserved color associated with a reserved color value from a single color table. The reserved color enables the dialog box to constantly maintain a pronounced visual differentiation from the displayed background. (See page 13, lines 5-8).

In order to establish a *prima facie* case of obviousness, there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Additionally, the combined references must teach or suggest all the claim limitations. There is no motivation to combine the teaching of Smith, where a single optimal color palette is created and used for display of objects, with the teachings of Alexander. Alexander cannot be modified to include a single optimal color palette of Smith, as providing a single optimal color palette will be useless in carrying out the invention of Alexander. The DRAM and VRAM each need a separate color palette in the respective memory to detect the programmed color and to display the appropriate data in the dialog box. (See *Figure 1 of Alexander*). Therefore, the single color palette of Smith is not applicable to Alexander. Moreover, even if there was motivation to combine the references, the resulting combination does not teach drawing a boundary surrounding the dialog box with a reserved color to visually differentiate the dialog box from the displayed background, as described in the claimed invention.

Accordingly, independent claims 1, 8, and 15, and the respective dependent claims are respectfully submitted to be patentable under 35 U.S.C. section 103(a) over any combination of the cited prior art.

The Applicants respectfully submit that all of the pending claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 774-6905. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP009). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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